

EXHIBIT 19

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

RICARDO SALOM, CATHERINE PALAZZO)
as assignee for RUBEN PALAZZO,)
and PETER HACKINEN, on their own)
behalf and on behalf of others)
similarly situated persons,)
Plaintiffs,) CASE NO.
vs.) 2:24-cv-00444-BJR
NATIONSTAR MORTGAGE, LLC,)
Defendant.)
_____)

ZOOM DEPOSITION OF RICARDO SALOM

MONDAY, FEBRUARY 10, 2025

Reported by: Shelley Lynn Schniepp

CSR No. 5487

Job No.: 314149

1 MS. HENRY: That's not the question you asked.
2 You asked a legal question. If you want to try
3 again --

4 BY MR. MANNING:

5 Q. Mr. Salom, you said that you are complaining
6 about a \$25 fee that Nationstar charged you, correct?

7 A. That's right.

8 Q. What is your understanding of what that \$25
9 fee was for?

10 A. No. I don't understand exactly what 25 -- the
11 only thing that I understand is they told me that it
12 shouldn't be signed -- it shouldn't be in my
13 statement.

14 Q. So the basis of your complaint is your
15 attorneys told you there shouldn't be a \$25 expedited
16 delivery fee?

17 A. Yes.

18 MS. HENRY: Objection; mischaracterizes the
19 client's testimony.

20 BY MR. MANNING:

21 Q. I believe you answered yes to that; is that
22 right? I just need a verbal answer to that, yes or
23 no?

24 A. Can you repeat that question, please?

25 Q. So the basis of your lawsuit is that your

1 attorneys told you you shouldn't have been charged a
2 \$25 expedited delivery fee?

3 A. Right.

4 Q. Do you have any knowledge or information about
5 why there was a \$25 fee for expedited delivery of a
6 payoff statement to you?

7 A. No.

8 Q. Do you recall ever calling in to Nationstar to
9 request a payoff statement?

10 A. No. I think it was real estate or just
11 attorney. I didn't call. I don't recall that.

12 Q. Do you know when my client, Nationstar,
13 started servicing your mortgage?

14 A. I don't remember exactly the date.

15 Q. Let me see if I can show you a document.

16 A. There two or three companies that handled
17 changing companies, Wachovia and then --

18 Q. I'm going to show you a document which is
19 addressed to you, Ricardo A. Salom, at your former
20 residence, correct?

21 A. Yes.

22 Q. It's entitled notice of servicing transfer.

23 A. I see that.

24 Q. It's dated March 13, 2019, correct?

25 A. Yes, it is.

1 Nationstar, something like that. I have no idea about
2 that.

3 Q. Do you have any memory of ever talking with
4 anyone at Mr. Cooper or Nationstar?

5 A. I spoke with someone at Mr. Cooper several
6 times, yes.

7 Q. What do you recall about the conversations you
8 had with someone at Mr. Cooper?

9 A. It's just --

10 MS. HENRY: Objection. This inquiry is not
11 limited to the scope of the Court's order here and I'm
12 going to refer back to Exhibit 1 and the general
13 objections; instruct him not to answer.

14 MR. MANNING: I'm just trying to find out if
15 he recalls anything at this point.

16 BY MR. MANNING:

17 Q. Do you recall anything about the conversations
18 you had with Nationstar?

19 A. No.

20 Q. Do you have any personal knowledge or
21 documentation in support of any evidence that you
22 believe the fee of \$25 that you were charged was unfair
23 or unlawful?

24 A. No.

25 Q. Do you have any memory if you were charged a

1 \$25 fee?

2 MS. HENRY: Before we go on, just pause for a
3 minute when he asks a question so that I have a chance
4 to object.

5 THE WITNESS: Okay.

6 MR. MANNING: We can just have the court
7 reporter read that last question back.

8 (Record read)

9 THE WITNESS: No -- I mean, the only thing I
10 just sign it, the document when I sold my house.
11 That's the only thing I realized at that time. But I
12 didn't talk with Mr. Cooper or anything like that,
13 nothing before about that so I have no idea about that.

14 I have no idea about the mortgage service and fees
15 charged. I have no idea.

16 BY MR. MANNING:

17 Q. I'm going to show you a document and see if it
18 refreshes your memory at all. This is a document from
19 my client, Nationstar, that reflects any calls that
20 were made on the account and I'm showing you a notation
21 from June 7, 2022 when my client says they talked to
22 customer, which would be you. It says, "Customer
23 called in to request information on payoff for July
24 12th. Provided estimate of payoff, advised can order
25 official payoff 30 days in advance. Advised can call

1 A. No, I don't remember that.

2 Q. Do you have any memory of speaking to somebody
3 about a \$25 fee for a faster payoff quote?

4 A. No, I didn't know that.

5 Q. The records reflect that you asked for it. Do
6 you have any reason to dispute that?

7 MS. HENRY: Objection; asked and answered.

8 BY MR. MANNING:

9 Q. You can answer.

10 A. No.

11 MR. MANNING: Madam Court Reporter, we'll mark
12 this as Exhibit 6.

13 (Exhibit 6 was marked.)

14 MR. MANNING: For the record, the notations
15 that were read on Exhibit 6 are from NSM 203 through
16 204.

17 BY MR. MANNING:

18 Q. Mr. Salom, are you doing okay or you need to
19 take a break?

20 A. No, no. I'm okay.

21 Q. I recall you saying that you don't have any
22 memory about whether you were charged a fee for the
23 payoff statements that we talked about, correct?

24 A. No.

25 Q. I'm going to show you another document to see

1 handling your payoff of your mortgage, how did they
2 know the amount of money to send to Nationstar to pay
3 off your mortgage?

4 MS. HENRY: Objection. I don't really
5 understand -- I don't understand what you're asking. I
6 don't know how he would have knowledge to know what
7 they're supposed to get. He wouldn't know specifically
8 what they need.

9 MR. MANNING: We've established he remembers
10 nothing so what I'm probing for is does he have any
11 knowledge relevant to this deposition and he said that
12 he has no reason to dispute receiving payoff quotes, so
13 I'm trying to understand if he recalls anything about
14 what he did or what a company for him did with a payoff
15 statement quote.

16 BY MR. MANNING:

17 Q. Do you have any knowledge whatsoever,
18 Mr. Salom?

19 A. What I know is basically the function or the
20 closing company, they sent -- they call us, they call
21 the buyer, they call the seller and they showed me the
22 documents. I sign it. I didn't realize how or who pay
23 any kind of fees. So I just sign it because I trust
24 that that company is a professional. I don't know
25 about the mortgage. That's the set of questions you

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3
4 I, SHELLEY LYNN SCHNIEPP, do hereby certify:

5
6 That I am a duly qualified Certified Shorthand
7 Reporter, in and for the State of California, holder of
8 certificate number 5487, which is in full force and
9 effect and that I am authorized to administer oaths and
10 affirmations;

11 That the foregoing deposition testimony of the
12 herein named witness was taken before me at the time
13 and place herein set forth;

14 That prior to being examined, the witness named
15 in the foregoing deposition, was duly sworn, or
16 affirmed by me, to testify to the truth, the whole
17 truth, and nothing but the truth;

18 That the testimony of the witness and all
19 objections made at the time of the examination were
20 recorded stenographically by me, and were thereafter
21 transcribed under my direction and supervision;

22 That the foregoing pages contain a full, true and
23 accurate record of the proceedings and testimony to the
24 best of my skill and ability;

25

1 I further certify that I am not a relative or
2 employee or attorney or counsel of any of the parties,
3 nor am I a relative or employee of such attorney or
4 counsel, nor am I financially interested in the outcome
5 of this action.

6
7 IN WITNESS WHEREOF, I have subscribed my name this
8 1st Day of March, 2025.

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13 SHELLEY LYNN SCHNIEPP, CSR No. 5487
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